

Commonwealth of Kentucky
Division for Air Quality
Permit Statement OF Basis

DRAFT PERMIT NO. F-06-025
TRANSCRAFT CORPORATION
3379 OWINGSVILLE ROAD, MT STERLING, KY
SEPTEMBER 1, 2006
FROUGH SHERWANI, REVIEWER
PLANT I.D. #: 21-173-00027
AI NUMNER: 3200
ACTIVITY NUMBER: APE20050002

SOURCE DESCRIPTION:

Transcraft Corporation manufactures flatbed trailers for use with semi tractors. On November 30, 2005 the source has applied to the Division for the renewal of their conditional major permit F-00-035

Emission Point 1 (EP 06) **Spray Booth (Three spray guns)**

Description:

MP1:

Maximum Usage per gun 7.97 gals/hr

Top Coat, Primer, and Catalyst

Date of Construction: March 1995

Estimated Transfer Efficiency: 45%

Estimated Control Efficiency (Filters) 95%

MP2:

Drying Oven # 1: Natural Gas, 1.2 MMbtu/hr

Date of Construction: March 1995

MP3:

Drying Oven# 2: Natural Gas, 2.0 MMbtu/hr

Date of Construction: March 1995

Emission Point. 2 (EP 03):

Welding Operation (MIG)

Description:

Electrode Usage: 80.0 lbs/hr

Date of Construction: March 1995

Emission Point 3:

Plasma Cutter

This point is a plasma cutter. The consumption of material at this point is 1.38 lbs/hr. This is an insignificant activity.

Emission Point 4:

Welding Station

This point is a welding station. Submerged arc welding is done at this station. The

consumption of electrode is 50.0 lbs/hr. This is an insignificant activity.

Emission Point 5:

Two Wash Booths

MP1:

This point is a Wash Booth. This is an insignificant activity.

MP2:

This point is a Wash Booth. This is an insignificant activity.

COMMENTS:

Type of control and efficiency:

There is no control for the VOC in the plant. The spray booth has a filter system to control the particulate matter emissions. The control efficiency of the filter estimated to be 95%.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors.

Applicable regulation:

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- B. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

Precluded Regulations:

40 CFR Part 63 Subpart M- National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metals Parts and Products.

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with

applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.